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13	Attorneys for Defendant Google LLC		
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION		
16		1	
17	CHASOM BROWN, et al., on behalf of	Case No. 4:20-cv-03664-YGR-SVK	
1/	themselves and all others similarly situated,	DECLARATION OF TRACY GAO IN	
18	Plaintiffs,	SUPPORT OF ADMINISTRATIVE	
10		MOTION TO SEAL PORTIONS OF	
19	VS.	JOINT STATUS REPORT PURSUANT TO DKT. NO. 830	
20	GOOGLE LLC,	10 BR1.110.000	
		Referral: Hon. Susan van Keulen, USMJ	
21	Defendant.		
22	PATRICK CALHOUN, et al., on behalf of	Case No. 4:20-cv-05146-YGR-SVK	
23	themselves and all others similarly situated,	DECLARATION OF TRACY GAO IN	
23	Plaintiffs,	SUPPORT OF ADMINISTRATIVE	
24		MOTION TO SEAL PORTIONS OF	
25	VS.	JOINT STATUS REPORT PURSUANT TO DKT. NO. 960	
23	GOOGLE LLC,	10 DIX1. 110. 700	
26		Referral: Hon. Susan van Keulen, USMJ	
27	Defendant.		
		1	
28			

Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK I, Tracy Gao, declare as follows:

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Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action.

I am a member of the bar of the State of California and an attorney with Quinn

Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google

4 5 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a

6

witness, I could and would testify competently thereto.

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LLC's Administrative Motion to Seal portions of the Joint Status Report Pursuant to Brown Dkt.

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No. 830 and Calhoun Dkt No. 960 ("Status Report"). In making this request, Google has carefully

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considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

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Google makes this request with the good faith belief that the information sought to be sealed consists

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of Google's confidential and proprietary information and that public disclosure could cause

competitive harm.

2.

3. I have reviewed the document to be filed under seal pursuant to Civil Local Rule 79-

5. Based on my review, there is good cause to seal the following information:

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Brown Dkt. No. 830; Joint Status Report Pursuant to Calhoun Dkt. 17 No. 960

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Jan. 10, 2023 Brown Hearing Transcript Pages 7:15-16, 8:9-10, 8:18, 8:21-22, 9:2-3, 9:5, 9:25, 12:5, 12:18, 12:25, 13:4, 15:16-18, 15:25, 16:8,

Exhibit 1 to Trebicka Declaration –

**Document(s)** to be Sealed

Joint Status Report Pursuant to

Pages 1:11-12, 1:14, 1:23, 1:25, 1:28,

2:1-3, 2:5-6, 2:9-10, 2:13-15, 2:18-19,

2:24, 3:5-9, 3:12, 3:19, 4:3-6, 4:8,

4:16, 4:27, 5:2, 5:13, 5:27, 6:13-14,

6:16-22, 6:24-28, 7:1-2, 7:7, 7:9, 7:12

The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.

**Basis for Sealing** 

The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google

> Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK

GAO DECLARATION ISO ADMINISTRATIVE MOTION TO SEAL

1	16:11-12, 17:6, 17:8, 18:6-10,	maintains as confidential in the ordinary course of its
2	18:13-16, 18:18, 19:17-18, 20:11, 21:23-24, 22:25, 26:10, 28:10,	business and is not generally known to the public or Google's competitors. Such confidential information
	28:21-22, 29:1-2, 29:4-7, 29:10-	reveals Google's internal systems. Public disclosure of such
3	11, 29:16, 30:4, 31:23, 34:22-24,	confidential information could affect Google's competitive
4	35:19, 35:22-23, 35:25	standing as competitors may alter their system designs and
5		practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
6	Exhibit 2 to Trebicka Declaration – Jan. 26, 2023 Letter to <i>Brown</i> and	The information requested to be sealed contains non-public, sensitive confidential business information related to
7	Calhoun	Google's internal technological systems that could affect Google's competitive standing and may expose Google to
8	Pages 1-6	increased security risks if publicly disclosed, including
9		various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google
10		maintains as confidential in the ordinary course of its business and is not generally known to the public or
11		Google's competitors. Such confidential information reveals Google's internal systems and operations. Public
12		disclosure of such confidential information could affect
13		Google's competitive standing as competitors may alter their system designs and practices relating to competing
		products, time strategic litigation, or otherwise unfairly
14		compete with Google.
15	Exhibit 3 to Trebicka Declaration –	The information requested to be sealed contains non-public,
16	Jan. 28, 2023 Letter to <i>Brown</i> and <i>Calhoun</i>	sensitive confidential business information related to Google's internal technological systems that could affect
10	Camoun	Google's competitive standing and may expose Google to
17	Pages 1-2	increased security risks if publicly disclosed, including
18		various types of Google's internal projects and internal
19		databases, which Google maintains as confidential in the ordinary course of its business and is not generally known
		to the public or Google's competitors. Such confidential
20		information reveals Google's internal systems and operations. Public disclosure of such confidential
21		information could affect Google's competitive standing as competitors may alter their system designs and practices
22		relating to competing products, time strategic litigation, or
23		otherwise unfairly compete with Google.
24	Exhibit 4 to Trebicka Declaration –	The information requested to be sealed contains non-public,
24	Jan. 30, 2023 Letter to <i>Brown</i> and <i>Calhoun</i>	sensitive confidential business information related to Google's internal technological systems that could affect
25	Cumoun	Google's competitive standing and may expose Google to
26	Pages 1-4	increased security risks if publicly disclosed, including
27		various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google
۷		maintains as confidential in the ordinary course of its
28		business and is not generally known to the public or
		Case No. 4:20-cv-03664-YGR-SVI

Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK

1		Google's competitors. Such confidential information reveals Google's internal systems and operations. Public
2		disclosure of such confidential information could affect
3		Google's competitive standing as competitors may alter their system designs and practices relating to competing
4		products, time strategic litigation, or otherwise unfairly compete with Google.
5	Trebicka Exhibit 5 – Jan. 10, 2023	The information requested to be sealed contains non-public, sensitive confidential business information related to
6	Calhoun Hearing Transcript	Google's internal technological systems that could affect
7	Pages 5:25, 6:2, 6:4, 6:13, 8:1, 8:3, 17:11, 18:20, 18:25, 19:1-2, 21:1,	Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including
8	21:22, 22:21, 25:5, 25:17, 25:20, 25:23, 26:4, 26:8-10, 26:16-17,	various types of Google's internal projects and internal databases, as well as internal metrics, which Google
9	28:1	maintains as confidential in the ordinary course of its
10		business and is not generally known to the public or Google's competitors. Such confidential information
11		reveals Google's internal systems and operations. Public disclosure of such confidential information could affect
12		Google's competitive standing as competitors may alter their system designs and practices relating to competing
13		products, time strategic litigation, or otherwise unfairly compete with Google.
14	Trebicka Exhibit 6 – Jan. 23, 2023	The information requested to be sealed contains non-public,
15	Correspondence	sensitive confidential business information related to Google's internal technological systems that could affect
16	Pages 1, 3-4	Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including
17		various types of Google's internal projects and internal
18		databases, which Google maintains as confidential in the ordinary course of its business and is not generally known
19		to the public or Google's competitors. Such confidential information reveals Google's internal systems and
20		operations. Public disclosure of such confidential information could affect Google's competitive standing as
21		competitors may alter their system designs and practices
22		relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
23		

4. Google's request is narrowly tailored in order to protect its confidential information. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google's highly-confidential, or confidential information, Google requests that the portions of the aforementioned documents be redacted from any public version of those documents.

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1	5.	Google does not seek to	o redact or file under seal any of the remaining portions of		
2	documents not indicated in the table above.				
3	6.	For the reasons discussed in the Motion, Google respectfully requests that the Court			
4	order the ide	order the identified portions of the Status Report to be sealed.			
5	I dec	I declare under penalty of perjury of the laws of the United States that the foregoing is true			
6	and correct. Executed in Washington DC on January 31, 2023.				
7					
8	DATED:	January 31, 2023	QUINN EMANUEL URQUHART & SULLIVAN, LLP		
9			SOLLIVAN, LLF		
10			To the state of th		
11		By /s/ Tracy Gao Xi ("Tracy") Gao  Attorney for Defendant			
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13		Allorney for Defenaani			
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